



Kenneth J. Smott
President & CEO

May 26, 2011

U.S. Environmental Protection Agency
c/o Grace Co
77West Jackson Blvd., (SE-5J)
Chicago, IL 60604-3590

US EPA RECORDS CENTER REGION 5



Re: Request for Information Pursuant to Section 104(e) of CERCLA for Lusher
Street Groundwater Contamination Site, Elkhart, Indiana

Dear Ms. Co:

Atlas Die, LLC responds as follows to the information request written by Mr.
Thomas C. Marks and dated May 3, 2011.

Question 1

ADI of Delaware / DBA Atlas Die LLC has owned and operated the facility at
1627 W. Lusher Avenue in Elkhart, Indiana, since January 3, 2003. The
purchase and sale agreement and related documents are voluminous and would
be burdensome and expensive to copy. Copies of these documents will be made
available to you for inspection and copying at your expense at a mutually
convenient time and location.

Information Source: Ken Smott – President and CEO

Question 2

No. Atlas Die has not and is not aware of any other person or entity that used,
purchased, stored, treated, disposed, transported, or otherwise handled any
material containing chlorinated solvents.

Information Source: Ken Smott – President and CEO, Kevin Deckard – Plant
Manager, Annette Jaske – Process Engineer

Question 3

No past or present solid waste management units are known on any property that Atlas Die has owned or leased within the boundaries of the Lusher Street Groundwater Site.

Information Source: Ken Smott – President and CEO

Question 4

Not applicable – No chlorinated solvents known of on property.

Information Source: Ken Smott – President and CEO, Kevin Deckard – Plant Manager, Annette Jaske – Process Engineer

Question 5

Atlas Die has been issued a wastewater discharge permit, a storm water permit (Notice of Sufficiency letter in place pending receipt of formal permit), and an air registration for its facility at 1627 Lusher Street in Elkhart, Indiana. Copies of these are attached.

Information Source: Ken Smott – President and CEO, Kevin Deckard – Plant Manager, Annette Jaske – Process Engineer

Question 6

Not aware of any other persons or entities that may have such information.

Information Source: Ken Smott – President and CEO, Kevin Deckard – Plant Manager, Annette Jaske – Process Engineer

Question 7

Not aware of any other person responsible for any leaks, spills or releases.

Information Source: Ken Smott – President and CEO, Kevin Deckard – Plant Manager, Annette Jaske – Process Engineer

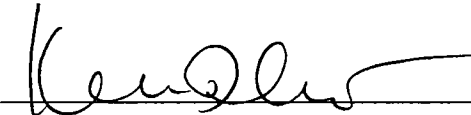


Kenneth J. Smott
President & CEO
Atlas Die, LLC

Certification Statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Print: Kenneth J. Smott_____

Its: President and CEO



City of Elkhart

PUBLIC WORKS & UTILITIES ADMINISTRATION

1201 S. Nappanee Street
Elkhart, Indiana 46516

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

Permit No. 85-16

In compliance with the provisions of the City of Elkhart Sewer Use and Rate Ordinance No. 4866,

**Atlas Chem-Milling
Division of Atlas Die, Incorporated
1627 W. Lusher Ave.
Elkhart, Indiana 46517
(574) 295-0277**

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Elkhart sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit. Nothing in this permit shall be construed to relieve the permittee from liabilities and administrative, civil or criminal penalties resulting from noncompliance with this permit or the City of Elkhart Sewer Use and Rate Ordinance No. 4866.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Elkhart Sewer Use and Rate Ordinance No. 4866.

This permit incorporates the City of Elkhart Sewer Use and Rate Ordinance No. 4866 and the City of Elkhart Enforcement Response Plan. Anything not covered specifically by this permit shall be referred to the City of Elkhart Sewer Use and Rate Ordinance No. 4866 and the City of Elkhart Enforcement Response Plan. No exceptions will be implied and must be expressly stated.

EFFECTIVE DATE: March 4, 2008

EXPIRATION DATE: March 4, 2013

If permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Article V.5.1.2 and 5.1.6, a minimum of 180 days prior to the expiration date.

I certify that I have read and am familiar with the conditions and terms contained in this Industrial Wastewater Discharge Permit.

KENNETH SUOCT president
Name of Corporate Officer Title

[Signature] 3/10/08
Signature of Corporate Officer Date

Sean Talkington Product Manager
Name of Authorized Representative Title

[Signature] 3/7/08
Signature of Authorized Representative Date

Lynn Newvine Environmental Monitoring Supervisor
Name of Utility Representative Title

[Signature] 3/6/08
Signature of Utility Representative Date

This permit is approved by the City of Elkhart Board of Public Works.

[Signature] 3/4/08
Arvis Dawson Date

[Signature] 3/4/08
Michael Machlan Date

[Signature] 3/4/08
Andy Jones Date

[Signature] 3/4/08
Frances O'Hara Date

[Signature] 3/4/2008
Andrew L. Carter Date

PART I. FACILITY DESCRIPTION

Atlas Chem-Milling, a Division of Atlas Die Incorporated, located at 1627 W. Lusher Avg., Elkhart, Indiana, is subject to the National Categorical Pretreatment Standards for the Electroplating Point Source Category, as listed in 40 CFR Part 413. More specifically, it is subject to Subpart F - Chemical Etching and Milling Subcategory as an existing source and therefore subject to Pretreatment Standards for Existing Sources (PSES) discharging 10,000 gallons or more per calendar day of electroplating process wastewater.

NOTE: All Calculations based on operating 24 hrs, 5 days/week, 50 weeks/yr.

A. Process Description

Items 1-3. Atlas Chem-Milling is an Industrial Facility that chemically mills, CNC machine-finishes, and sometimes coats carbon steel and some grades of stainless steel to fabricate cutting tools for converting industries such as label-makers and folding carton packaging suppliers.

Notes: All rinse waters listed in processes below are directed to the Wastewater Pretreatment System. Rinse water from Etching Department is reused non-contact cooling water from machines which then goes into the process waste stream. Disposition and use of other chemicals is listed with each process. Water added back to tanks = Average based on 5 day work week, with more being added back typically at the beginning of each week after weekend shutdown.

The Process is as follows:

1. Metal Preparation (Stainless Steel).

- A. Aqueous Alkaline Cleaner to remove dirt, etc. from the surface.
 - a. Chemical Used: ChemStation 5618.
 - b. One 240gal tank @ 10% v/v concentration, discharged to Wastewater Pretreatment System about 14 times per year.
 - c. Add back approximately 8 gal water per day Tues-Fri and 12 gallons on Monday, due to evaporation and dragout.
- B. City Water Rinse and DI Water Rinse.
- C. Aqueous Acidic Micro-etch to remove outer steel surface layer.
 - a. Chemical Used: Ferric chloride.
 - b. One 130gal tank @ 70% v/v concentration, discharged about 14 times per year to Bulk Storage Tank, hauled away as reusable product.
 - c. Total annually hauled, 546 gallons water and 1274 gallons chemical.
 - d. Add back approximately 10 gal water per week, due to evaporation and dragout.
- D. City Water Rinse and DI Water Rinse.
- E. Chemical Passivation.
 - a. Chemical Used: Nitric Acid.
 - b. Two 240gal tanks, each @ 50% v/v concentration, discharged about once every 1 to 2 years, hauled away as hazardous waste.
 - c. Add back approximately 8 gallons of DI water per month to each tank, due to evaporation and dragout.
- F. DI Water Rinse.

2. Metal Preparation (Carbon Steel heat treated with "blue" surface).

- A. Aqueous Alkaline Cleaner to remove dirt, etc. from the surface.
 - a. Chemical Used: ChemStation 5618.
 - b. One 240gal tank @ 10% v/v concentration, discharged to Wastewater Pretreatment System about 14 times per year.
 - c. Add back approximately 8 gal water per day Mon-Fri and 12 gal on Monday, due to evaporation and dragout.
- B. City Water Rinse.
- C. Aqueous Acidic Micro-etch to remove outer steel surface layer.
 - a. Chemical Used: Duraprep SSP1000.
 - b. One 140gal tank @ 15% v/v concentration, discharged about once every 6 months, hauled away as hazardous waste.
 - c. One 130gal tank @15% v/v concentration, discharged about once every 6 months, hauled away as hazardous waste.
 - d. Total hauled annually 459gal water and 81gal chemical.
 - e. Add back approximately 6 gallons per month to 140 gal tank, due to evaporation and dragout.
 - f. Add back approximately 3 gal water per day to 130gal tank, due to evaporation and dragout.
- D. City Water Rinse and/or DI Water Rinse.
- E. Physical Surface Preparation.
 - a. Pumice Powder and City Water (Large Format).
 - b. City Water Rinse and/or DI Water Rinse (Large Format).
 - c. Non-recirculating City Water Rinse in automated "scrubber" Machine (Small Format).

3. Metal Preparation (Carbon Steel heat treated with "bright" surface).

- A. Automatic Cleaning Machine.
 - a. Chemical Used: SLAM Degreaser.
 - b. Chemical Used (additive): Beavgr Research Defoamer.
 - c. DI Water Rinse.

4. Film Processing.

- A. Processing Film.
 - a. Chemical Used: Kodak RP 2000P Developer.
 - b. Chemical Used: Kodak RP 3000P Fixer.
 - c. System monitors chemistry of baths and is set up on feed and bleed additions of approximately 2 gal each of Developer and Fixer per day that drain through Silver Recovery System to the Wastewater Pretreatment System.
- B. Cleaning Processor.
 - a. Chemical Used: Algae Clear.
 - b. Chemical Used: Fixer System Cleaner.
 - c. Note: Both chemicals used in small amounts, measurable in ounces.
 - d. Processor is cleaned once every 4 months. Approximately 5 gal each of Developer and Fixer are drained through Silver Recovery System to the Wastewater Pretreatment System.
- C. Silver Recovery System.
 - a. Electroplating unit removes silver from Wastewater stream.
 - b. Eco-shield Filter removes silver from Wastewater stream.

5. Photochemical Application.

- A. This Process does not use water or create related wastewater streams.

6. Developing Applied Photochemical from Steel.

- A. Photochemical removed in process is one of the following:
 - a. Laminar HG20.
 - b. Laminar KM30.
 - c. Laminar GA13.
 - d. Kolon KP2150.
- B. Developing Solution (Large Format).
 - a. Chemical Used: Resolve 211.
 - b. One 140gal re-circulating spray tank @ 2% v/v concentration, discharged to Wastewater Pretreatment System about once every 2 weeks.
 - c. City Water Rinse.
- C. Developing Solution (Small Format).
 - a. Chemical Used: Resolve 211.
 - b. One 250gal machine sump @ 2% v/v concentration, discharged to Wastewater Pretreatment System about 2 times per week.
 - c. One 100gal re-circulating rinse chamber, discharged to Wastewater Pretreatment System about 2 times per week.
 - d. Add back approximately 15 gallons of water per day due to dragout (carry-over to the rinse chamber).
 - e. Fresh City Water Rinse Chamber.
 - f. Non-contact Cooling Water.
- D. Cleaning Automatic Developer.
 - a. Cleaned about once every 2-3 months.
 - b. Chemical Used: EQC-1 Equipment Cleaner.
 - c. Uses 20gal cleaner in developer sump and 2 gal cleaner in rinse chamber sump, cleaning solution discharged to Wastewater Pretreatment System.

7. Chemical Milling (Etching) Carbon and Stainless Steel.

- A. Etching.
 - a. Chemical Used: Ferric chloride.
 - b. Chemical Used (additive): Hydrochloric Acid, 20°Baumé.
 - c. Chemical Used (additive): Defoamer.
 - d. City Water Rinse.
 - e. Non-Contact Cooling Water (reused in Rinsing—step 7.A.d.).
 - f. An estimated 1250 gallons of Ferric are rinsed into water treatment system as part of the etching process and treated annually.
- B. Cleaning Etching Machines (Routine Maintenance).
 - a. Chemical Used: Hydrochloric Acid, 20°Baumé.
 - b. Chemical Used: EQC-1 Equipment Cleaner.
 - c. City Water Rinse.
 - d. Non-Contact Cooling Water (reused in Rinsing—step 7.B.c.).
 - e. Chemical discharged from machines as well as chemical used for cleaning machines hauled as bulk reusable product.
 - f. Average amount hauled annually from etching processes 7.A. and 7.B. is 37,112 gallons water and 185,965 gallons chemical.

8. Stripping Photochemical from Steel may be in automatic machine OR manual (soaking tank).

- A. Stripping (automated machine).
 - a. Chemical Used: Os Tech OS-987 Stripper. (Occasionally SurfaceStrip 448 or 446-1, depending on product line)

- b. Chemical Used (additive): Os Tech OS-419 Defoamer.
- c. City Water Rinse.
- d. This machine when it is used continuously, depending on size of product lines being etched, is discharged about every 2 weeks; but, depending on production, may go a few months without being used at all or discharged.
- e. This machine is equipped with a filter unit that removes and collects the photoresist solids, which are hauled as Non-hazardous waste.
- f. The fluid drops in pH as it is used so that it is normally around pH 9 to 10 at the time that it discharges.
- B. Stripping (manual soak tank).
 - a. Chemical Used: SurfaceStrip 448.
 - b. One tank 130 gallons @ 40% v/v concentration, discharged approximately every 3 months, hauled as hazardous waste.
 - c. One tank 115 gallons @ 25% v/v concentration, discharged approximately every 2 months, hauled as hazardous waste.
 - d. Total waste hauled annually made up of 830 gallons water and 380 gallons chemical.
 - e. City Water Rinse.
- C. Post-Stripping Cleaning of Steel.
 - a. Pumice Powder.
 - b. City Water Rinse.

9. Machine Finishing CNC Operation.

- A. Sanitary Sink in this area is only contributor to daily Wastewater Discharge.
- B. All CNC machines in this area are self-contained, using oil and/or coolant which is hauled and recycled as Non-hazardous chemical mixture.
- C. Two surface grinders in this area use biodegradable, water-based metal-working fluid (Product Used: Cool Cut).
 - a. One sump is 45 gallons and the other is approximately 100 gallons, both operate at 9% v/v concentration.
 - b. Combined, these machines consume approximately 22 gallons of DI make up water daily (over 24hr period).
 - c. Each machine is discharged about 2 times a year, with the fluid being treated through the Wastewater Treatment System.
 - d. The metal fines are filtered out of the larger machine sump as part of the process in a paperbed filter, and fines from both are collected and hauled as Non-hazardous solid waste.

10. Wastewater Pretreatment Process.

- A. Note: Wastewater is normally acidic.
- B. pH Adjustment.
 - a. Chemical Used: Caustic Soda 50%.
- C. When alkaline-containing tanks or machines are discharged, pH is monitored and tanks are discharged slowly so that acidity of normal process water will maintain pH below 10.
 - a. In case of accidental high pH, Hydrochloric acid is added manually to adjust it and a "Water Treatment Incident Report" is completed and filed, noting the amount of acid used.
- D. Water Treatment System operates using 3 pH probes which are cleaned and calibrated at least weekly, with a 3-point calibration using approximately 200 ml each of 4.0, 7.0 and 10.0 buffer solutions, which are then disposed of to the Water Treatment System.

11. Process Chemical Testing (Lab).

- A. Ferric chloride used in etching department is tested daily using KF indicator and dilute NaOH.
- B. Metal Preparation (Cleaning) department chemicals are tested 1-3 times per week, titrated using small amounts of dilute HCl, dilute NaOH, dilute Potassium dichromate and pH color end-point indicators.

12. Other Raw Materials Used for Non-Wastewater-Producing Process Applications:

- A. 2408 Atlas Silver—Electrostatic Coating Process (Post-CNC Finishing Process).
- B. Isopropyl Alcohol (Used in Wash bottles throughout plant).
- C. Acetone (Used in Wash bottles and in cleaning of Coating Equipment—Coating Process and Removing Photochemical repair residue during Stripping Process).
- D. MEK (Used in Wash bottles—Coating Process and Removing tape residue after Etching Process).
- E. Lacquer Thinner (Finishing Process).
- F. Various machine oils and coolants in CNC machines.

B. Water Usage and Discharge Information

Atlas Chem Milling discharges an average of 28,083 gallons of wastewater per day. This discharge is composed of:

- 1) 26,968 gpd from four process waste streams
- 2) 5,098 gpd non-contact cooling water
- 3) 300 gpd contact cooling water
- 4) 815 gpd sanitary wastewater

The following details the average water usage within the facility over a three year period. The summary above uses average flows for 2006.

1. Waste Stream #1, Metal Preparation. (Total Usage 5115gal/day)

- A. Water used for Charging Cleaning tanks:
 - a. Tank #1: $240\text{gal} \times 90\% \times 14 \text{ discharges/yr} = 3024\text{gal/yr}$.
 - b. Tank #3: $130\text{gal} \times 30\% \times 14 \text{ discharges/yr} = 546\text{gal/yr}$.
 - c. Tank #7(2006): $140\text{gal} \times 85\% \times 2 \text{ discharges/yr} = 238\text{gal/yr}$.
 - d. Tank #7('04-'05): $140\text{gal} \times 73\% \times 12 \text{ discharges/yr} = 1226\text{gal/yr}$.
 - e. Tank #8: $130\text{gal} \times 85\% \times 2 \text{ discharges/yr} = 221\text{gal/yr}$.
 - f. Tank #9: $240\text{gal} \times 90\% \times 14 \text{ discharges/yr} = 3024\text{gal/yr}$.
 - g. Rinse out tanks 1, 3, and 9 when discharged: $20\text{gal} \times 3 \text{ tanks} \times 14 \text{ discharges/yr} = 840\text{gal/yr}$.
 - h. Dump Automated Plate Cleaner: $150\text{gal/dump} \times 33 \text{ discharges/yr} = 4950\text{gal/yr}$.
 - i. **Subtotal: 13,502gal/yr. (54gal/day)**

B. Make up water Used:

- a. Tank #1: $8\text{gal/day} \times 4\text{days} \times 50\text{wks} \text{ plus } 12\text{gal} \times 1\text{day} \times 50\text{wks} = 2200\text{gal/yr}$.
- b. Tank #3: $10\text{gal/week} \times 50\text{wks/yr} = 500\text{gal/yr}$.
- c. Tank #4: $4\text{gal/week} \times 50\text{wks/yr} = 200\text{gal/yr}$.
- d. Tank #5: $4\text{gal/week} \times 50\text{wks/yr} = 200\text{gal/yr}$.
- e. Tank #7: $6\text{gal/mo} \times 12 \text{ mo/yr} = 72\text{gal/yr}$.
- f. Tank #8: $3\text{gal/day} \times 5 \text{ days/wk} \times 50 \text{ wks/yr} = 750\text{gal/yr}$.

- g. Tank #9: 8gal/day x 4days x 50wks plus 12gal x 1day x 50wks = 2200gal/yr.
 - h. **Subtotal: 6,122gal/yr. (24gal/day)**
- C. Rinse Water Used in Processing Stainless:
- a. Average Plates Cleaned per year = 1985.
 - b. City Water Rinse 2 times per plate during processing.
 - c. DI Water Rinse 3 times per plate during processing.
 - d. City Water rinse tank uses 32gal/minutes, avg rinse is 2 min/plate.
 - e. Avg DI usage per rinse = 40 gal.
 - f. City Water Used: 2rinses x 32gal/min x 2 min x 1985plates = 254,080 gal/yr.
 - g. DI Water Rinse Water Used: 3rinses x 40 gal/rinse x 1985plates = 238,200gal/yr.
 - h. **Subtotal: 492,280gal/yr. (1969gal/day)**
- D. Rinse Water Used in Processing Carbon Steel (large format):
- a. Average Plates Cleaned per year = 1080.
 - b. City Water Rinse (32gal/min) on Cleaning Deck 3 times per plate during processing, avg rinse 2min/plate.
 - c. City Water Used for Powerbrushing, Average 30gal/plate.
 - d. DI Rinse 1 time per plate in processing, avg water used per rinse 50 gal.
 - e. City Water Used (cleaning deck): 3rinses x 32gal/min x 2min x 1080 plates = 207,360gal/yr.
 - f. City Water Used (powerbrush): 30gal/plate x 1080plates = 32,400gal/yr.
 - g. DI Water Used: 50 gal/rinse x 1080 plates = 54,000gal/yr.
 - h. **Subtotal: 293,760gal/yr. (1175gal/day)**
- E. Rinse Water Used in Processing Carbon Steel (small format Anvil):
- a. Average Anvil plates processed per year: 31% "blue" and 69% "bright" of 6100 plates total.
 - b. City Water rinse used for blue plates: 2 rinses per plate x 32gal/min x 1 min/rinse x 1891plates = 121,024gal/yr.
 - c. City Water used in Automatic scrubber: avg 30gal/plate x 1891plates = 56,730gal/yr.
 - d. DI Rinse Water used in Automated plate cleaner for bright plates: avg 10gal/plate x 4209plates = 42,090gal/yr.
 - e. **Subtotal: 219,844gal/yr. (879gal/day)**
- F. Rinse Water Used in Processing Carbon Steel (small format Craft):
- a. Average Craft plates processed annually over past 3 years= 7377.
 - b. All of these are bright, run through Automated plate cleaner.
 - c. Avg 10gal/plate x 7377plates = 73,770gal/yr
 - d. **Subtotal: 73,770gal/yr (295gal/day)**
- G. Rinse Water Used in Processing "Strip and Reclean" Plates.
- a. Average Carbon Steel plates stripped and recleaned annually = 24.
 - b. Average Stainless plates stripped and recleaned annually = 60.
 - c. Recleaning Carbon Steel plates:
 - 1. Stripper Rinse: 24plates x 40gal/plate = 960gal/yr.
 - 2. Powerbrush: 24plates x 30gal/plate = 720gal/yr.
 - 3. CS5618 City Water Rinse: 24plates x 2min/rinse x 32gal/min = 1536gal/yr.
 - 4. SSP City Water Rinse: 24plates x 2min/rinse x 32gal/min= 1536gal/yr.
 - 5. DI Water Rinse: 24plates x 50gal/plate = 1200gal/yr.
 - d. Recleaning Stainless Steel plates:
 - 1. Stripper Rinse: 60plates x 40gal/plate = 2400gal/yr.
 - 2. Powerbrush: 60plates x 30gal/plate = 1800gal/yr.
 - 3. CS5618 City Water Rinse: 60plates x 2min/rinse x 32gal/min = 3840gal/yr.

4. DI Rinse after CS5618 and Nitric acid: $60 \text{ plates} \times 2 \text{ rinses/plate} \times 40 \text{ gal/rinse} = 4800 \text{ gal/yr.}$

e. **Subtotal: 17,256gal/yr. (69gal/day)**

H. Additional Water Usage in Cleaning Room:

- a. Cleaning Decking and outside of tanks and rinsing out recycled drums and other equipment such as transfer pumps: Estimated additional **650gal/day.**

2. Waste Stream #2, Developing. (Total Usage 3106gal/day)

A. Water Used to Charge/Maintain Large Format Developing Tank.

- a. $140 \text{ gal tank} \times 98\% \times 25 \text{ discharges/yr} = 3430 \text{ gal/yr.}$
 b. Make up water added: est. $15 \text{ gal/day} \times 5 \text{ days/wk} \times 50 \text{ wks/yr} = 3750 \text{ gal/yr.}$
 c. **Subtotal: 7180gal/yr (29gal/day)**

B. Water Used to Charge/Maintain Small Format Developer.

- a. Developer Sump: $250 \text{ gal} \times 98\% \times 2 \text{ discharges/wk} \times 50 \text{ wks/yr} = 24,500 \text{ gal/yr.}$
 b. Re-circulating Rinse Sump: $100 \text{ gal} \times 2 \text{ discharges/wk} \times 50 \text{ wks/yr} = 10,000 \text{ gal/yr.}$
 c. Make up Water Added back: $30 \text{ gal/day} \times 5 \text{ days} \times 50 \text{ wks} = 7500 \text{ gal/yr.}$
 d. **Subtotal: 42,000gal/yr (168gal/day)**

C. Fresh Rinse Chamber Automatic Developer.

- a. Runs continuously while machine is on at approximately 8gal/min.
 b. It takes an Average of 6 minutes for one plate to get through the machine and one additional minute for each plate run consecutively through the machine.
 c. On Average, the machine is turned on and run when 4 anvil plates are ready or when 20 craft plates are ready or when 2 small FC are ready.
 d. Anvil plates cleaned are cut down into production sizes before printing/developing to prepare for etching.
 e. Average # plates over past 3 years anvils=8762, craft=7377, small FC=148.
 f. Rinse Anvils: $8762/4 \text{ plates/run} \times 10 \text{ min} \times 8 \text{ gal/min} = 175,240 \text{ gal/yr.}$
 g. Rinse Craft: $7377/20 \text{ plates/run} \times 25 \text{ min} \times 8 \text{ gal/min} = 73,770 \text{ gal/yr.}$
 h. Rinse small FC: $148/2 \text{ plates/run} \times 7 \text{ min} \times 8 \text{ gal/min} = 4144 \text{ gal/yr.}$
 i. **Subtotal: 253,154gal/yr. (1013gal/day)**

D. Fresh Water Rinse Large Format.

- a. Average 3149 plates developed annually (including strip & reclean).
 b. Average 5 minutes rinse per plate with flow of 30gal/min.
 c. **Subtotal: 472,350gal/yr (1889gal/day).**

E. Cleaning of Large Developer Containment Pit:

- a. Cleaned approx once per month, using est. 150gal water.
 b. **Subtotal: 1800gal/yr (7gal/day)**

3. Waste Stream #3 Etching (Total Usage 11,161gal/day).

- A. Calculated by elimination of usage in other areas, due to lack of data collected and lack of water meters on processes.

4. Waste Stream #4 Stripping (Total Usage 9,359gal/day)

A. FC Product Line.

- a. Stripper Rinse: Avg. $3213 \text{ plates/yr} \times 40 \text{ gal/plate} = 128,520.$
 b. Powerbrush (2 times per plate in process): $3213 \text{ plates/yr} \times 30 \text{ gal/plate} \times 2 \text{ times/plate} = 192,780 \text{ gal/yr.}$

- c. Rinse after Powerbrush (2 times per plate in process): $3213 \text{ plates/yr} \times 30 \text{ gal/plate} \times 2 \text{ times/plate} = 192,780 \text{ gal/yr}$.
- d. **Subtotal: 514,080 gal/yr (2056 gal/day)**

B. Anvil and Craft Product Lines.

- a. Average 16,139 plates processed annually over past 3 years, with about 10% of them going through the automated stripper for one year of that time.
- b. Stripper Rinse ('04-'05): $16,139 \text{ plates/yr} \times 30 \text{ gal/plate} = 484,170 \text{ gal/yr}$.
- c. Stripper Rinse ('06): $14,525 \text{ plates/yr} \times 30 \text{ gal/plate} = 435,750 \text{ gal/yr}$.
- d. Automated Stripper Rinse ('06): $1614 \text{ plates/yr} \times 8 \text{ min/plate} \times 15 \text{ gal/min} = 193,680 \text{ gal/yr}$
- e. Powerbrush (2 times per plate in process): $16,139 \text{ plates/yr} \times 20 \text{ gal/plate} \times 2 \text{ times/plate} = 645,560 \text{ gal/yr}$.
- f. Powerbrush Rinse: $16,139 \text{ plates/yr} \times 20 \text{ gal/plate} \times 2 \text{ times/plate} = 645,560 \text{ gal/yr}$.
- g. **Subtotal: 1,823,710 gal/yr (7,295 gal/day)**

C. Automated Stripper Charge/Maintain Fluid.

- a. Used about 1 yr of past 3 years, discharged 12 times/yr. $220 \text{ gal sump} @ 5\%$.
- b. $220 \text{ gal} \times 95\% \times 12/3 = 836 \text{ gal/yr}$. (avg over 3 years).
- c. Add back Average 80 gal/month = 320 gal/yr (avg over 3 years).
- d. Rinse out machine at dump: $220 \text{ gal} \times 12/3 = 880 \text{ gal/yr}$ (avg over 3 years).
- e. **Subtotal: 2036 gal/yr (8 gal/day)**.

5. Waste Stream #5 Film Processing (Total Usage 9 gal/day)

- A. 2 gal Fixer and 2 gal Developer used daily = 1000 gal/yr .
- B. 5 gal Fixer and 5 gal Developer used 4 times/yr to clean processor = 40 gal/yr .
- C. Processor Rinse Chamber cleaned daily, approx 5 gal/day = 1250 gal/yr .
- D. **Subtotal: 2290 gal/yr (9 gal/day)**.

6. Waste Stream #6 Machine Finishing (Total Usage 10 gal/day)

- A. Large Surface grinder only in service 2006.
 - a. Discharged 2 times: $100 \text{ gal} \times 91\% \times 2/3 = 61 \text{ gal/yr}$ (avg over 3 years).
 - b. Add back 10 gal/day DI water = $10 \text{ gal/day} \times 5 \text{ days} \times 50 \text{ wks} / 3 = 833 \text{ gal/yr}$ (avg over 3 years).
- B. Small Surface Grinder
 - a. Discharged avg 2 times/yr: $45 \text{ gal} \times 91\% \times 2 \text{ discharges} = 82 \text{ gal/yr}$.
 - b. Add back 6 gal/day DI Water = $6 \text{ gal/day} \times 5 \text{ days} \times 50 \text{ wks} = 1500 \text{ gal/yr}$.
- C. **Subtotal for section 6.A. and 6.B.: 2476 gal/yr (10 gal/day)**.

7. Chemical Testing Lab, (Estimated usage 15 gal/day).

8. Contact Cooling Water: Fume Scrubber, (Estimated usage 300 gal/day).

9. Non-Contact Cooling Water (Total Usage 6793 gal/day):

- A. Automated Developer.
 - a. Runs 5 gal/min while machine is operating.
 - b. Operating time calculated based on plates run in section 2 above.
 - c. $31644 \text{ min/yr} \times 5 \text{ gal/min} = 158,220 \text{ gal/yr (633 gal/day)}$
- B. Etching Department.
 - a. Cooling Water in winter is re-circulated through a holding tank in the room, with water being reused in the process to rinse plates. (accounted for in section 3 above.)

- b. In the Summer, for extreme conditions, water can be switched over to run fresh city water through the machines for more consistent cooling (est. 5wks/yr).
- c. Meters only exist on 2 of the machines...Average usages based on known restricted flows through each set of coils.
- d. 3 etchers avg 5gal/min flow through 2 chambers each (usu. Only 2 run at any time and Average run time of 12hrs/day).
- e. 1 etcher has 10gal/min flow through 2 chambers (this machine only ran one year of past 3 years, Average of 10hrs/day).
- f. 1 etcher has 20gal/min flow through 2 chambers. (this machine runs about 18hrs/day).
- g. $2 \text{ etchers} \times 5\text{gal/min} \times 2\text{chambers} \times 720\text{min/day} \times 5\text{days/wk} \times 5\text{wks/yr} = 360,000\text{gal/yr}$.
- h. $1 \text{ etcher} \times 10\text{gal/min} \times 2\text{chambers} \times 600\text{min/day} \times 5\text{days/wk} \times 5\text{wks/yr} \text{ divided by } 3 \text{ years} = 100,000\text{gal/yr (avg over 3 years)}$.
- i. $1 \text{ etcher} \times 20\text{gal/min} \times 2\text{chambers} \times 1080\text{min/day} \times 5\text{days/wk} \times 5\text{wks/yr} = 1,080,000\text{gal/yr}$.
- j. **Subtotal: 1,540,000gal/yr (6160gal/day).**

C. Pretreatment

The Pumping/Piping system previously located on the "Pump Side" of the underground Wastewater Treatment Tank has been moved above-ground, directly above the underground tank. The cover (doors) were removed and the tank area enclosed and heated as part of this project. The Wastewater is still transferred to the Treatment Room via the underground pipe. This project minimized the need for entry into a Permit Required Confined Space to clean the pump strainer or maintain the pump and did not change the processing of the Wastewater or the discharge point.

The process wastewater is pretreated by pH adjustment. The company uses an aqueous based system. Non-contact cooling water, which was previously discharged to the sewer after pretreatment, is presently reused in the process, therefore becoming part of the process wastewater flow.

PART II. EFFLUENT LIMITATIONS

A. During the period of **March 4, 2008 to March 4, 2013** the permittee is authorized to discharge process wastewater to the City of Elkhart sewer system through the control manhole located at south of the building, near Fieldhouse Avenue.

B. During the period of **March 4, 2008 to March 4, 2013**, the **discharge at the control manhole** shall not exceed the following effluent limitations. Effluent at this sampling location consists of process wastewater and sanitary wastewater combined.

**CONTROL MANHOLE
END OF PIPE EFFLUENT LIMITATIONS
COMBINED WASTESTREAM**

<u>PARAMETER</u> ⁵	<u>DAILY MAXIMUM</u> ⁶ mg/L	<u>4-DAY AVERAGE</u> ⁷ mg/L	<u>Ordinance Limits</u> ⁸ mg/L
pH	(max) 10.0 (min) 5.0 (S.U.)		
TSS			250 (surcharged)
cBOD ₅			250 (surcharged)
Ammonia (NH ₃ -N)			25 (surcharged)
Total Phosphorus			11 (surcharged)
Cadmium	1.16	0.68	1.2
Chromium (T)	6.79	3.88	7.0 (T)
Copper	4.37	2.62	4.5
Lead	0.58	0.39	0.6
Nickel	3.98	2.52	4.1
Zinc	4.08	2.52	4.2
Silver	1.2	---	1.2 ⁹
Cyanide (T)	1.84	0.97	1.75 (T)
Total Metals	10.19	6.60	--
TTO	2.07	--	--

C. The end of pipe or combined wastestream effluent limitations, are the more stringent of
1) the alternate categorical limits;

2) local limits according to the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Article 4.5.

D. The Combined Wastestream Formula has been applied in accordance with 40 CFR Part 403.6(e). The calculations are as follows:

⁵ All metals shall be analyzed as total metals.

⁶ Daily maximum discharge is defined as the arithmetic mean of the pollutant concentration derived from all measurements taken that day.

⁷ Four day Average is defined as the Average value from four consecutive *sampling* days.

⁸ City of Elkhart Sewer Use and Rate Ordinance No. 4866, Article 4.5.

⁹ Ordinance Limit will apply.

COMBINED WASTESTREAM FORMULA (cwf)

$$\text{CWF CONCENTRATION} = \frac{(\text{PSES}_{\text{conc}} \times \text{FLOW}_{\text{process}})}{\text{FLOW}_{\text{total}}}$$

PSES CONCENTRATION is the National Categorical Standard (concentration expressed as mg/L);

FLOW_{process} is the regulated process Average daily flow (gpd);

FLOW_{total} is the total Average daily flow (gpd) through the control manhole.

The resultant limits at "end of pipe" are as follows:

	<u>DAILY MAXIMUM</u>	<u>4-DAY AVERAGE</u>	
		<u>Categorical</u>	<u>CWF</u>
(Cadmium _{cwf}) =	$\frac{(1.2 \times 26,968)}{(27,783)} = 1.16$	0.7	0.68
(Chromium _{cwf}) =	$\frac{(7.0 \times 26,968)}{(27,783)} = 6.79$	4.0	3.88
(Copper _{cwf}) =	$\frac{(4.5 \times 26,968)}{(27,783)} = 4.37$	2.7	2.62
(Lead _{cwf}) =	$\frac{(0.6 \times 26,968)}{(27,783)} = 0.58$	0.4	0.39
(Nickel _{cwf}) =	$\frac{(4.1 \times 26,968)}{(27,783)} = 3.98$	2.6	2.52
(Zinc _{cwf}) =	$\frac{(4.2 \times 26,968)}{(27,783)} = 4.08$	2.6	2.52
(TTO _{cwf}) =	$\frac{(2.13 \times 26,968)}{(27,783)} = 2.07$		
(Cyanide (T) _{cwf}) =	$\frac{(1.9 \times 26,968)}{(27,783)} = 1.84$	1.0	0.97
(Total Metals _{cwf}) =	$\frac{(10.5 \times 26,968)}{(27,783)} = 10.19$	6.8	6.60

E. During the period of **March 4, 2008 to March 4, 2013**, the **discharge at the end of process, located inside permittee's plant, at the end of pretreatment**, shall not exceed the following effluent limitations. This sampling location is of process waste-water only and is not combined with sanitary wastewater.

**SELF MONITORING LOCATION
END OF PROCESS EFFLUENT LIMITATIONS
NATIONAL CATEGORICAL PRETREATMENT STANDARDS**

<u>PARAMETER</u>	<u>DAILY MAXIMUM</u> mg/L	<u>4-DAY AVERAGE</u> mg/L
pH	(max) 10.0 (min) 5.0	(std.Units)
Cadmium	1.2	0.7
Chromium (T)	7.0	4.0
Copper	4.5	2.7
Lead	0.6	0.4
Nickel	4.1	2.6
Zinc	4.2	2.6
Cyanide (T) ⁶	1.9	1.0
Total Metals ⁷	10.5	6.8
TTO	2.13	--
Silver	1.2 (Ordinance Limit)	

F. The end of process effluent limitations are set forth in the National Categorical Pretreatment Standards for Electroplaters, 40 CFR 413.64(c) AND (g) and apply at the end of the regulated process prior to dilution, without utilizing the Combined Wastestream Formula.

PART III. SELF MONITORING REQUIREMENTS

A. From the period beginning on the effective date of the permit until June 18, 2007, **the permittee shall monitor at the end of process**, for the following parameters, at the indicated frequency:

⁶ The Ordinance limit will apply since it is the most stringent.

⁷ Total Metals is the sum of the concentration or mass of Copper (Cu), Nickel (Ni), Chromium (Cr) and Zinc (Zn).

<u>PARAMETER</u>	<u>FREQUENCY</u>	<u>SAMPLE TYPE</u> ⁸
pH	every 2 months	Grab ⁹
Zinc	every 2 months	one day's composite
Copper	every 2 months	one day's composite
Cyanide (T)	every 2 months	Grab
Nickel	every 2 months	one day's composite
Silver	every 2 months	one day's composite
Total Metals	every 2 months	one day's composite
Chromium	every 2 months	one day's composite
TTO ¹⁰	every 6 months	Grab
Cadmium	every 6 months	one day's composite
Lead	every 6 months	one day's composite

- B. A Grab sample is defined as an individual sample collected over a period of time not to exceed 15 minutes.
- C. For this application, a composite sample is interpreted to be a minimum of four grab samples collected at equal intervals, collecting identical volumes, over the period of the work day. Upon review, the Pretreatment Office may increase the number of grab samples added to the composite to be collected. The sample volume will depend on the number of analyses to be performed by the analytical laboratory. Alternative methods may be submitted for approval and must demonstrate to be representative of discharge.

PART IV. REPORTING

A. Self-monitoring sampling results from sampling conducted in a calendar month shall be summarized and reported to the Pretreatment Office in the following month. **The reports must be submitted to the Pretreatment Office by the 25th day of each following month.** The reports must include:

- 1) The Cover Page to Self Monitoring Report
- 2) Report Certification Statement signed by the authorized representative
- 3) Industrial User Sampling Event Report
- 4) An original of the laboratory report and chain of custody

⁸ Samples are to be taken in accordance with 40 CFR, Part 136 and amendments thereto, according to the City of Elkhart Sewer Use and Rate Ordinance No 4866, Article 5.4, unless specified otherwise in this permit.

⁹ In a grab sample, pH must be taken within 30 minutes following sample collection. If a continuous measurement is done, calibration data must be submitted to the Pretreatment office with monitoring reports. No pH taken on a composite will be accepted.

¹⁰ The TTO requirement may be fulfilled through a certification and implementation of a Toxic Organic Management Plan.

B. Semi-annual Pretreatment Reports shall be submitted to the POTW, in the Industrial User Process Report, on June 25th and December 25th, and shall include the information listed below:

- 1) measured or estimated average and maximum daily flows for the reporting period in gallons per day [40 CFR 403.12(e)]
- 2) estimated 30 minute peak flow (highest flow for a 30 minute period)
- 3) maximum pH
- 4) minimum pH

C. Permittee shall keep all wastewater information readily available for City inspection. It shall include the following information:

- 1) process wastewater discharges, including flows in gallons;
- 2) pretreatment system maintenance activities, if applicable;
- 3) recalibration data for all flow measuring and other monitoring equipment, if applicable;
- 4) copies of laboratory analyses and chain of custody information;
- 5) copies of all documents forwarded to the City in the self-monitoring reports.

Copies of such information or portions thereof shall be furnished to the City upon request.

D. The Slug/Spill Prevention Plan is to be prepared in accordance with the City of Elkhart Sewer Use and Rate Ordinance No.4866, Section 4.13.1. which states:

- (a) The Slug discharge prevention/control plan may be part of an SIU's existing contingency plan, emergency response plan, or spill plan developed under other Federal, State or local regulations. At a minimum, the following elements shall be part of the submitted plan:
 - (1) Description of Discharge practices, including non-routine batch discharges;
 - (2) Description of stored chemicals, including chemical name, amount stored and storage location;
 - (3) Notification procedures, in accordance with paragraph 4.13.3 of this Section, for immediately notifying the POTW of spills or Slug discharges, including any Discharge that would violate a prohibition under Section 4.2;
 - (4) If necessary, procedures to prevent adverse impacts from Slug discharges or spills, including, but not limited to, the following:
 - (i) Inspection and maintenance of storage areas,
 - (ii) Handling and transfer of materials,
 - (iii) Loading and unloading operations,
 - (iv) Control of plant site runoff,
 - (v) Worker training,
 - (vi) Building of containment structures or equipment,
 - (vii) Measures for containing toxic organic pollutants (including solvents), and
 - (viii) Measures and equipment for emergency responses.

Such plans shall be revised and updated whenever plant operational changes affect the validity of the plans, but in any case, not less often than every three (3) years. Failure to comply with this requirement may result in

administrative penalties as defined in Section 12.1 of this Ordinance. Any significant plan revisions, including revisions involving construction/installation of new facilities, shall be submitted to the Director prior to implementation of such revisions

Slug Discharge Prevention/Control Plan

- (b) Each SIU shall provide protection from spills or Slug discharges. The Director shall determine if a Slug discharge prevention/control plan is required by an SIU. An SIU that is required to have a Slug discharge prevention/control plan shall not commence discharging to the POTW until a plan has been submitted to the Director. The Director's review of such plan, including any facilities and operating procedures, shall not relieve the SIU from the responsibility to modify such plan as necessary to maintain compliance with applicable Federal, State, and local regulations. In addition, the submission of such plan to the Director shall not relieve the SIU of its responsibility to comply with all other laws and regulations governing the use, storage, and transportation of hazardous substances. Facilities necessary to implement these plans shall be provided and maintained at the SIU's expense.
- (c) Such plans shall be revised and updated whenever plant operational changes affect the validity of the plans, but in any case, not less often than every three (3) years. Failure to comply with this requirement may result in administrative penalties as defined in Section 12.1 of this Ordinance. Any significant plan revisions, including revisions involving construction/installation of new facilities, shall be submitted to the Director prior to implementation of such revisions.

The plan must be submitted to the Pretreatment Office and revised and updated every three years.

- E. All forms required are included in the Forms section of this Permit.
- F. If TTO reporting is required, it shall be performed according to instructions provided in the Forms section of this Permit. The instructions and required Certification Statement are included.
- G. All reports shall include all proper signatures according to the City of Elkhart's Sewer Use and Rate Ordinance No. 4866, Section 5.2.4 which states:

5.2.4 Signatory Requirements and Certification.

- (a) All reports required by this Ordinance and other information requested by the Director shall be submitted with the certification statement contained in Section 5.1.2(c) (3) of this Ordinance and properly signed by a person described in Section 5.1.2(c) (1) or (2) or by a duly authorized representative of the person described in Section 5.1.2(c) (1) or (2) if:
 - (1) The authorization is made in writing by the person described in Section 5.1.2(c) (1) or (2);
 - (2) The authorization specifies either the individual or a position having responsibility for the overall operation of the facility from which the industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (3) The written authorization is submitted to the Director.
- (b) If an authorization under Section 5.2.4(a) above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of Section 5.2.4(a) shall be submitted to the Director prior to or together with any reports or information to be signed by an authorized representative.

- H. Notification and resampling shall be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.2.1 which states:

5.2.1 Self-Monitoring Reports.

All SIUs shall submit all notices and self-monitoring reports that are deemed necessary by the Director to assess and assure compliance by SIUs with applicable Pretreatment Standards and Requirements. These reports shall be required according to the conditions specified in an SIU's Industrial Wastewater Discharge Permit and shall be certified and signed as required in Section 5.2.4.

(a) Re-sampling Requirement.

If sampling performed by the SIU indicates a violation, the SIU shall notify the Director immediately after becoming aware of the violation. The SIU shall repeat the sampling and analysis and submit the results of the repeat analysis to the Director within thirty (30) calendar days after becoming aware of the violation.

(b) Additional Self-Monitoring.

If an SIU monitors any Pollutant more frequently than required by the Director, using procedures established by 40 CFR 136, the SIU shall include the results of this monitoring in the report.

PART V. POTW MONITORING AND INSPECTIONS

All POTW monitoring and inspections will be performed according to the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Article VI, which states:

6.1 Surveillance of Industrial Users.

To establish a feasible surveillance schedule, the following monitoring frequencies are established:

6.1.1 City Monitoring

- (a) The Director shall perform a minimum of two (2) unscheduled monitoring events each calendar year at each SIU.
- (b) The Director may perform Demand Monitoring at an Industrial User when warranted in the opinion of the Director in response to a known or suspected violation discovered in a self-monitoring report, routine sampling trip or by public complaint. Demand Monitoring may consist of site inspection, records review and seven (7) consecutive days of sampling.

6.1.2 Self-monitoring.

- (a) An SIU shall perform self-monitoring at least as frequent as required by the National Categorical Pretreatment Standards.
- (b) Notwithstanding Section 6.1.2(a) above, an SIU shall perform self-monitoring as frequently as established in an SIU's Industrial Wastewater Discharge Permit, but in any case, not less than the total minimums set forth below in Section 6.1.3, unless approved by the Board. The Director may require more frequent monitoring based on potential degree of adverse impact on the POTW, variability in types or amounts of Pollutants discharged, concentration or loading of Compatible Pollutants, or to ascertain continued compliance.
- (c) The Board may approve in an SIU's Industrial Wastewater Discharge Permit the use of the monitoring results from one (1) of the City's monitoring events in lieu of one (1) of the required SIU self-monitoring events.

6.1.3 Minimum Self-Monitoring Frequency Permit Requirements.

<u>Industry Flow</u> <u>(Average Gallons per Day)</u>	<u>Monitoring Frequency</u>
0 - 10,000	Once every six months
10,001 - 25,000	Once every three months
25,001 - 50,000	Once every two months
50,001 - 100,000	Once a month
greater than 100,000	Once every two weeks

6.2 Surveillance Charge.

6.2.1 The Director shall have the authority to charge any User a surveillance charge. The surveillance charge may be based on, but not limited to, the cost of sample collection, analysis and reporting as well as site inspection and records evaluation costs.

6.2.2 The Board shall have the authority to review on an annual basis the surveillance charge and to adjust the charges accordingly to achieve actual cost reimbursement.

6.3 Monitoring of Significant Industrial Users.

- 6.3.1 An SIU shall install, at its own expense, monitoring facilities as required in Section 5.3 of this Ordinance, unless said SIU can demonstrate to the Director that compliance with this requirement would cause undue hardship. In such cases, the Director shall provide for alternate monitoring procedures in the SIU's Industrial Wastewater Discharge Permit. The Director shall have the right of full access, at all times, to said monitoring facility to conduct tests on the quantity and quality of Effluent being discharged by the SIU.
- 6.3.2 In addition to any equipment provided by the SIU, the Director may install additional metering or monitoring equipment during a surveillance period in or near to the SIU's monitoring facility.
- 6.3.3 In the event of continuing exceedance of an SIU's Effluent Limitations or frequent fluctuations in an SIU's Wastewater Constituents and Characteristics, the Director may require an SIU to install additional monitoring equipment which may include, but not be limited to, a device for continuously and automatically measuring and recording flow and/or a device for automatically taking discrete and composite samples of Wastewater.
- 6.3.4 Each SIU shall measure and record the following data in accordance with the schedule established in the IU's permit and the sampling and analytical requirements in Section 5.4.3 of this Ordinance:
 - (a) Total daily Wastewater discharge (gallons per day).
 - (b) Concentration of each Wastewater Constituent or Characteristic specified in the permit.
 - (c) Total daily discharge of each Wastewater Constituent or Characteristic specified in the permit.
- 6.3.5 The Director may monitor and analyze the Wastewater of any SIU on a daily basis when just cause exists. If at any time the rate of Wastewater discharge, or concentration or mass of a Wastewater Constituent or Characteristic, exceeds the maximum limits in the permit, the Director shall be notified as required in Section 5.1.4 (i) and (j).
- 6.3.6 All metering or monitoring equipment installed by the SIU shall be installed, maintained and calibrated in accordance with the manufacturers recommended standards for the specific equipment.

PART VI. NONCOMPLIANCE AND ENFORCEMENT

All noncompliance and enforcement action determinations will be made according to the City of Elkhart Sewer Use and Rate Ordinance No.4866 and the City of Elkhart Enforcement Response Plan.

PART VII. STANDARD CONDITIONS AND PROHIBITIONS

All conditions and prohibitions contained in the City of Elkhart Sewer Use and Rate Ordinance No. 4866 shall be incorporated in this permit by reference, and any violations of any such conditions shall constitute violation of this permit.

PART VIII. REOPENER CLAUSE

This permit may be reopened and modified in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.1.3 which state:

5.1.3 Permit Modification, Revocation and Termination.

- (a) The permittee shall be informed by the Director of any proposed permit changes at least thirty (30) calendar days prior to the effective date of any change.
- (b) A permit may be modified, in whole or in part, revoked or terminated during its term for cause as specified in this Section 5.1.3. Such action may be taken at the Director's own initiative based on, but not limited to, a request of any interested Person. If the Director determines that cause exists for modification or revocation of a permit, the Director may require from the permittee an updated application or a pertinent portion of an application if such current information is needed to prepare the permit.
- (c) Causes for modification, revocation or termination of a permit include the following:
 - (1) Violation of any term or condition of the permit.

- (2) Failure of the permittee to disclose fully all relevant facts or any misrepresentation of any relevant facts by the permittee in an application or during the permit issuance process.
- (3) A change in any condition that requires either a temporary or a permanent reduction or elimination of any Discharge controlled by the permit, e.g., plant closure, a change in State law that requires the reduction or elimination of the

Discharge, or information indicating that the permitted Discharge poses a substantial threat to human health or welfare.

- (4) Failure of the permittee to accurately report the Wastewater Constituents and Characteristics of the permittee's Discharge.
 - (5) Failure of the permittee to report significant changes in operations or Wastewater Constituents and Characteristics.
 - (6) Refusal of reasonable access to the permittee's premises for the purpose of inspection or monitoring.
- (d) In addition to the provisions of paragraphs (b) and (c), a permit may be modified for any of the following causes:
- (1) Material and substantial alterations or additions to the User's operation which were not covered in the effective permit, e.g., production changes, relocation or combination of discharge points, changes in the nature or mix of products produced, provided that such alterations do not constitute total replacement of the process or production equipment causing the Discharge which converts it into a New Source.
 - (2) Within nine (9) months of the promulgation of a National or State Categorical Pretreatment Standard, the Industrial Wastewater Discharge Permit of Users subject to such standards shall be modified to require compliance with such standard within the time frame prescribed by such standard. In addition, the User with an existing Industrial Wastewater Discharge Permit shall submit an updated application to the Director within one hundred eighty (180) days after the promulgation of the applicable Categorical Pretreatment Standard.
- (e) A permittee shall:
- (1) Report to the Director plans for or information about any activity that has occurred or will occur that would constitute cause for modification or revocation of a permit under this Section 5.1.3;
 - (2) Comply with the existing permit until it is modified or reissued.

PART IX. ANNUAL PUBLICATION

Annual publication of significant noncompliance will be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 7.5, which states:

- 7.5 Publication of Violations.
The Director shall at least annually publish in the newspaper of general circulation having the largest circulation within the City a list of the Users which, at any time during the previous twelve (12) months, were in Significant Noncompliance, as defined in Section 2.1.65.

and the City of Elkhart Enforcement Response Plan.

PART X. SEWER CHARGES, SURCHARGES, SERVICE FEES AND PRETREATMENT

All sewer charges, surcharges, service fees and pretreatment charges are set forth in the City of Elkhart Ordinance No. 4866, Article XI.

PART XI. RIGHT OF ENTRY

In accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.4, which states:

5.4 Inspection and Sampling.

5.4.1 Inspection

- (a) The Director or Inspector may inspect the facilities of any User to ascertain whether the User is complying with the provisions and requirements of this Ordinance. The Director or Inspector shall perform a minimum of one (1) scheduled and one (1) unscheduled inspection each calendar year at each SIU.
- (b) Upon request by the Director, Users shall allow the Director or its representative or the Approval Authority access to all parts of the premises for the purpose of ensuring compliance with this Ordinance. The Director, Inspector and the Approval Authority shall have the right to enter onto a User's property to set up such devices as are necessary to sample, inspect, monitor or meter operations of the User to determine compliance with this Ordinance. Where a User has security measures in force which would require proper identification and clearance before entry into their premises, the User shall make necessary arrangements so that upon presentation of suitable identification, personnel of the Director or the Approval Authority shall be permitted to enter, without delay, for the purposes of performing their specific responsibilities. Unreasonable

delays in allowing the Director, Inspector or Approval Authority access to the User's premises shall be a violation of this Ordinance.

5.4.2 Search Warrants

The Director may obtain a search warrant from a court of competent jurisdiction when:

- (a) The Director is able to demonstrate that a User is violating any provision of this Ordinance and the Director has been refused access to a building, structure, or property, or any part thereof, or
- (b) The Director, as part of a routine inspection and sampling program, needs to inspect or sample to verify compliance with this Ordinance or to protect the overall public health, safety and welfare of the community.

5.4.3 Sample Analyses

All analyses, including sampling results submitted in support of any application, reports, evidence or required by any permit or order, shall be performed in accordance with the techniques prescribed in 40 CFR Part 136, as amended. If 40 CFR Part 136 does not contain sampling or analytical techniques for the Pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other sampling and analytical procedures approved by the Director.

City personnel shall not be restricted in any way from inspecting and sampling permittee's facility or discharges.

Monitoring facilities shall be provided for and maintained in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.3.2.

5.3.2 Location of Monitoring Facilities.

The Director may require an Industrial User to provide and operate, at its own expense, monitoring facilities to allow inspection, sampling and flow measurement of the Industrial User's Industrial Waste. The monitoring facility shall be located on the Industrial User's premises unless the Director determines that such a location would be impractical for purposes of providing independent and unscheduled monitoring activities or causes undue hardship on the Industrial User. In such cases, the monitoring facility may be constructed in the public right-of-way or easement, in an unobstructed location. The location of the monitoring facility shall provide ample room in or near the monitoring facility to allow accurate sampling and preparation of samples for analysis. The Industrial User's monitoring facility and sampling and measuring equipment shall be maintained at all times by the Industrial User in a safe and proper operating condition at the expense of the Industrial User. Whether constructed on public or private

property, the monitoring facilities shall be provided in accordance with the Director's requirements and all applicable local construction standards and specifications, and such facilities shall be constructed and maintained in such a manner so as to enable the Director to perform independent monitoring activities.

PART XII. PERMIT TRANSFER

All permit transfers shall be performed in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.1.7 which states:

5.1.7 Permit Transfer.

Industrial Wastewater Discharge Permits are issued to a specific User for a specific operation. A permit may be transferred to another Person by a permittee, without modification or revocation, if the following events occur:

- (a) The current permittee provides written notification to the Director at least thirty (30) calendar days in advance of the proposed transfer date. The notification shall include:
 - (1) A written agreement containing a specific date for transfer of permit responsibility and coverage between the current permittee and the transferee (including acknowledgment that the existing permittee is liable for violations up to that date and that the transferee is liable for violations from that date on).
 - (2) The transferee certifies in writing the transferee's intent to operate the facility without making such material and substantial alterations or additions to the facility as would significantly change the nature or quantities of Pollutants discharged and thus constitute cause for permit modification under Section 5.1.3.
- (b) The Director, within thirty (30) calendar days after receiving the transfer notification from the permittee, does not notify the current permittee and the transferee of the need to modify, revoke or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

PART XIII. NOTIFICATION OF INDUSTRIAL PRETREATMENT BYPASSES

All notification of industrial bypasses shall be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 4.14.3, which states:

4.14.3 Notification of Bypasses

With any Bypass, the Industrial User shall comply with the following notification requirements.

(a) Anticipated Industrial Pretreatment Bypasses.

If an Industrial User knows in advance of the need for an Industrial Pretreatment Bypass, the Director shall receive written notification from the Industrial User at least 48 hours before the date of such Bypass describing the cause of the Bypass, the Bypass's impact on any effluent limits, and the anticipated date and duration of the Bypass.

(b) Unanticipated Industrial Pretreatment Bypasses.

An Industrial User shall notify the Director of any unanticipated Industrial Pretreatment Bypass. The notification shall include the following:

- (1) Oral notice to the Director immediately after the Industrial User becomes aware of the Bypass.
- (2) A written report within five (5) calendar days of the time the Industrial User becomes aware of such Bypass. This report shall specify the following:
 - (i) A description of the Bypass, the cause thereof, and the Bypass's impact on any limits;
 - (ii) The amount/volume and duration of the Bypass, including exact dates and times;
 - (iii) If the Bypass has not been corrected, the anticipated time it is expected to continue; and
 - (iv) Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the Bypass.

PART XIV. NOTIFICATION OF SPILLS, SLUG DISCHARGES AND OPERATION UPSETS

All notification of spills, slug discharges and operation upsets shall be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 4.13.3, which states:

4.13.3 Reports of Spills, Slug Discharges and Operation Upsets.

(a) Oral Notice

The User shall notify the City's Public Works and Utilities Department by telephone within fifteen (15) minutes of becoming aware of any spill, Slug discharge, or operation Upset.

The notification shall include location and duration of the discharge, type of Waste, including concentration, pH, volume and corrective actions.

(b) Written Notice.

- (1) Within five (5) working days following such an incident, the User shall submit to the Director a detailed written report signed by the User describing the cause of the Discharge and the measures to be taken by the User to prevent similar future occurrences.
- (2) Such notification shall not relieve the User of any expense, loss, damage or other liability which may be incurred as a result of damage to the POTW, fish kills, or any other damage to person, property or the environment.
- (3) Such notification shall not relieve the User of any fines, civil penalties, or other liability, which may be imposed by this Ordinance or other applicable law.
- (4) Following such an incident, the User may be required by the Director to appear before the Board and provide a full explanation of the Discharge and of steps being taken to prevent its recurrence.

PART XV. DUTY TO MITIGATE

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant and/or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 4.18, which states:

4.18 Duty to Mitigate - Prevention of Adverse Impact.

All Users shall take all reasonable steps to minimize or prevent any adverse impact of any Discharge in violation of this Ordinance which has a reasonable likelihood of adversely affecting human health, the POTW, the waters receiving the POTW's discharge, or the environment.

PART XVI. NOTICE OF PERMIT REVOCATION

This permit may be revoked pursuant to permittee noncompliance in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.1.3, which states:

5.1.3 Permit Modification, Revocation and Termination.

- (a) The permittee shall be informed by the Director of any proposed permit changes at least thirty (30) calendar days prior to the effective date of any change.
- (b) A permit may be modified, in whole or in part, revoked or terminated during its term for cause as specified in this Section 5.1.3. Such action may be taken at the Director's own initiative based on, but not limited to, a request of any interested Person. If the Director determines that cause exists for modification or revocation of a permit, the Director may require from the permittee an updated application or a pertinent portion of an application if such current information is needed

- to prepare the permit.
- (c) Causes for modification, revocation or termination of a permit include the following:
- (1) Violation of any term or condition of the permit.
 - (2) Failure of the permittee to disclose fully all relevant facts or any misrepresentation of any relevant facts by the permittee in an application or during the permit issuance process.
 - (4) A change in any condition that requires either a temporary or a permanent reduction or elimination of any Discharge controlled by the permit, e.g., plant closure, a change in State law that requires the reduction or elimination of the Discharge, or information indicating that the permitted Discharge poses a substantial threat to human health or welfare.
 - (4) Failure of the permittee to accurately report the Wastewater Constituents and Characteristics of the permittee's Discharge.
 - (5) Failure of the permittee to report significant changes in operations or Wastewater Constituents and Characteristics.
 - (6) Refusal of reasonable access to the permittee's premises for the purpose of inspection or monitoring.
- (d) In addition to the provisions of paragraphs (b) and (c), a permit may be modified for any of the following causes:
- (1) Material and substantial alterations or additions to the User's operation which were not covered in the effective permit, e.g., production changes, relocation or combination of discharge points, changes in the nature or mix of products produced, provided that such alterations do not constitute total replacement of the process or production equipment causing the Discharge which converts it into a New Source.
 - (2) Within nine (9) months of the promulgation of a National or State Categorical Pretreatment Standard, the Industrial Wastewater Discharge Permit of Users subject to such standards shall be modified to require compliance with such standard within the time frame prescribed by such standard. In addition, the User with an existing Industrial Wastewater Discharge Permit shall submit an updated application to the Director within one hundred eighty (180) days after the promulgation of the applicable Categorical Pretreatment Standard.
- (e) A permittee shall:
- (1) Report to the Director plans for or information about any activity that has occurred or will occur that would constitute cause for modification or revocation of a permit under this Section 5.1.3;
 - (2) Comply with the existing permit until it is modified or reissued.

PART XVII. SEVERABILITY

If any provisions, paragraph, word, section or article of this permit is invalidated by the City of Elkhart Board of Public Works or any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections and chapters shall not be affected and shall continue in full force and effect.

PART XVIII. RETENTION OF RECORDS

a) The permittee shall retain records of monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended at the request of the City of Elkhart at any time.

b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Elkhart shall be

retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

This provision is mandated in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4866, Section 5.1.8 which states:

5.1.8 Records Retention.

All information, records, reports, books, etc., required pursuant to an Industrial Wastewater Discharge Permit, whether prepared by or on behalf of the User, shall be retained and preserved by such User for a minimum period of three (3) years from time of their creation. All records that pertain to matters which are the subject of any enforcement action or litigation shall be retained and preserved by the User until all enforcement activities have concluded and all periods of limitations with respect to any and all appeals have expired. This period of retention shall also be extended when requested by the Director or the Approval Authority.

PART XIX. OPERATOR CERTIFICATION

The permittee shall comply with all operator certification requirements as mandated by state law.

PART XX. EXCEPTIONS

No exceptions shall be implied from any part of this permit. Any and all exceptions must be expressly stated upon approval by the City. All sections of the City of

Elkhart Sewer Use and Rate Ordinance No. 4866 and the Enforcement Response Plan shall apply to all permit holders.

INDUSTRIAL USER SAMPLING EVENT REPORT

Industry Name: _____ Permit #: _____

Sampler Name(s): _____

Sample Type:

☐ **Grab:** Month _____ Day ____ Year _____ Time _____ am ☐ pm ☐

Individual sample collected over a period of time not exceeding fifteen minutes.

☐ **Composite:** Start: Month _____ Day ____ Year _____ Time _____ am ☐ pm ☐
End: Month _____ Day ____ Year _____ Time _____ am ☐ pm ☐

Composite Method:

☐ Manual

☐ Automatic Sampler

☐ **Flow Proportional:** Sample collected every _____ gallons

Minimum of four grab samples collected over a time greater than fifteen minutes and combined in proportion to the wastewater flow

☐ **Time Proportional:** Time Interval _____ Number Combined _____

Minimum of four grab samples of equal volume collected over a time greater than fifteen minutes that is representative of the discharge

Location of Event: ☐ End of Process or Pretreatment

☐ End of Pipe

Samples in Proper Containers? ☐ Yes ☐ No

Samples Properly Preserved?* ☐ Yes ☐ No

**specific information shall be included with the chain of custody*

Chain of Custody:

Date	Relinquished By	Received By	Time

Please include the original laboratory report(s).

SELF-MONITORING REPORT
COVER PAGE

Industry Name: _____

Permit Number: _____

Checklist of Enclosures

This report includes the following information:

- ☐ *Industrial User Sampling Event Report*
- ☐ Copy of the analysis report from the respective laboratory, with pertinent required information, including:
 - ☐ Analytical results
 - ☐ Sample type (Grab or Composite)
 - ☐ Sample dates and times
 - ☐ Method of analysis
 - ☐ Analyst's initials
 - ☐ Date and time of analysis
 - ☐ Preservation
 - ☐ Container type (glass or plastic)
- ☐ *Report Certification Statement*
- ☐ *Industrial User Process Report*

Compliance Evaluation

Indicate the compliance status of your company based on the information contained in this report:

This company is: ☐ **in compliance**

☐ **out of compliance**

If the company is "out of compliance", indicate below if the POTW or Pretreatment Office was notified:

☐ **Yes** Date: _____ Time: _____

Industrial Rep's Name: _____

Utility Rep's Name: _____

☐ **No**

INDUSTRIAL USER PROCESS REPORT

Industry Name: _____

Date Report Submitted: _____

Reporting Period: _____

	Process (batch)	Total
Average Daily Flow (gpd)	_____	_____
Maximum Daily Flow (gpd)	_____	_____
Estimated 30 min. peak flow	_____	_____

Maximum pH (S.U.)*	_____	_____
Minimum pH (S.U.)*	_____	_____

* Indicate if these are ☐ **End of Pipe** OR ☐ **End of Process** values.

Name of Authorized Representative

Title

Signature of Authorized Representative

Date

REPORT CERTIFICATION STATEMENT

All reports submitted to the City must include the following certification statement, signed by an Authorized Representative.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name of Authorized Representative

Title

Signature of Authorized Representative

Date

TTO CERTIFICATION STATEMENT

In lieu of TTO monitoring, this statement may be submitted as part of the reporting requirement for TTO.

"Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority."

Name of Authorized Representative

Title

Signature of Authorized Representative

Date

TTO MONITORING REQUIREMENTS

- A. The Total Toxic Organics (TTO) limitation is defined as the summation of all quantifiable values greater than 0.01 mg/L for the toxic organic compounds that appear on the list included in your permit. The sum of all values for each total toxic organic shall not exceed the TTO limitations.
- B. The permittee needs to analyze only for those toxic organics that would reasonably be expected to be present in the discharge.
- C. In lieu of monitoring for TTO, the control authority may allow the permittee to make the following TTO Certification Statement as a comment to the periodic reports required per this permit.

"Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for Total Toxic Organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the Toxic Organic Management Plan submitted to the control authority."

- D. In requesting that no monitoring be required, the permittee shall submit a Toxic Organic Management Plan (TOMP) that specifies to the control authority's satisfaction the following conditions:
 - 1. the toxic organic compounds used;
 - 2. the method of disposal used instead of dumping, such as reclamation, contract hauling, incineration, etc.; and
 - 3. the procedures for assuring that toxic organics do not routinely spill or leak into the wastewater

Department of Environmental Management
Office of Water Quality - Mail Code 65-42
100 N. Senate Ave.
Indianapolis IN 46204-2251

Wastewater Operator Class B

Number	Effective Date	Expiration Date
WW018256	07/01/2009	06/30/2011

Annette M. Jaske



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 14, 2007

65-42 PS/AB
Curt Cather
Atlas Chem-Milling
1627 W. Lusher Avenue
Elkhart, IN 46517

Dear Mr. Cather:

Re: Notice of Sufficiency (NOS)
Atlas Chem-Milling
Elkhart, IN

The Notice of Intent (NOI) letter submitted to the Indiana Department of Environmental Management (IDEM) is sufficient to comply with the NOI letter requirements of the NPDES general permit rule for storm water discharge associated with industrial activity, 327 IAC 15-6.

An NPDES general permit identification number is being assigned to each facility that has submitted an NOI to comply with 327 IAC 15-6. This number will be used as an identification number and should be included on any type of correspondence or amended NOI letter submitted to IDEM relating to the NPDES general permit for storm water. The general permit number assigned to this facility is: **INR200321**

The following requirements of the general permit rule must be submitted within 365 days from submitting the NOI letter:

- Analytical results of outfall(s) to be monitored
- Stormwater Pollution Prevention Plan Checklist (State Form 51287)
- Annual Report

IDEM's Rule 6 website, <http://www.in.gov/idem/water/npdes/permits/wetwthr/storm/rule6.html> can offer you assistance with the requirements of the rule, and the necessary forms for compliance. If you have any questions regarding this letter or the storm water general permit requirements, please contact Ms. Alison Beumer at 317/233-0202 or 1-800-451-6027 ext. 30202.

Please send all correspondence to:

**IDEM - Office of Water Quality
Storm Water Group
Attention: Rule 6 Coordinator
100 N. Senate Avenue, MC 65-42
Indianapolis, IN 46204**

Sincerely,

Alison D. Beumer

Alison D. Beumer, Rule 6 Coordinator
Industrial Permits Section
Office of Water Quality



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TO: Interested Parties / Applicant

DATE: April 10, 2006

RE: Atlas Chem-Milling / 039-22364-00502

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS dot 03/23/06



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Mr. Kreig Lee
Atlas Chem-Milling
1627 West Lusher Avenue
Elkhart, Indiana 46517

April 10, 2006

Re: Registered Construction and Operation Status,
039-22364-00502

Dear Mr. Lee:

The application from Atlas Chem-Milling received on December 13, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following printing plate and photographic plate manufacturing operation to be located at 1627 West Lusher Avenue, Elkhart, Indiana, is classified as registered:

- (a) One (1) natural gas-fired water heater, identified as WH-1, with a maximum capacity of 0.075 MMBtu/hr.
- (b) Two (2) natural gas-fired space heaters, identified as H1 and H2, with a maximum capacity of 0.20 MMBtu/hr each.
- (c) One (1) natural gas-fired space heater, identified as H3, with a maximum capacity of 0.30 MMBtu/hr.
- (d) One (1) natural gas-fired air makeup unit, identified as A1, with a maximum capacity of 0.407 MMBtu/hr.
- (e) One (1) steel plate cleaning operation, identified as PCR-1, including dip tanks and one (1) automated mechanical plate cleaning machine for bright carbon steel with a maximum capacity of cleaning 3.23 plates per hour. The automated plate cleaning machine was installed in 2002.
- (f) Two (2) laminating and printing operations, including two (2) small format laminating presses and one (1) printer, identified as SFLP-1, and one (1) large format laminating press and one (1) printer, identified as LFLP-1, each operation with a maximum capacity of 1.615 plates per hour.
- (g) Two (2) developing operations, including one (1) small format plate developer and electric drying oven, identified as SFD-1, and one (1) large format plate developer and electric drying oven, identified as LFD-1, each with a maximum capacity of 1.615 plates per hour per operation.
- (h) One (1) pre-etching inspection and associated solvent cleaning operation, identified as PEI-1, used to apply nail polish to plates prior to etching, with a maximum capacity of 3.23 plates per hour.

- (i) Five (5) plate etching machines, identified as PEM-1 through PEM-5, utilizing hydrochloric acid, each with a maximum capacity of 0.646 plates per hour, controlled by a wet fume scrubber. PEM-1 and PEM-5 were installed prior to 1998, PEM-2, PEM-3, and PEM-4 were installed between 2002 and 2004 to replace previously permitted equipment.
- (j) Three (3) stripping areas consisting of the one (1) small format automated stripping machine, one (1) small format stripping dip tank, and one (1) large format stripping dip tank, two (2) drying areas consisting of one (1) small format automated dryer and one (1) large format drying area, and the associated inspection operations, identified as SDI-1. The small format automated stripping machine and the small format automated dryer were installed in 2004. These operations have a maximum capacity of 3.23 plates per hour.
- (k) One (1) plate finishing operation, identified as PF-1, with seven (7) CNC machines, each with a maximum capacity of 0.5383 plates per hour, two (2) automated, submerged liquid grinding machines, each with a maximum capacity of 1.615 plates per hour, and one (1) submerged liquid horizontal bandsaw with a maximum capacity of 3.23 plates per hour, and one (1) hand plate finishing and associated solvent cleaning operation, installed prior to 1956, with a maximum capacity to coat 3.23 plates per hour.
- (l) One (1) electrostatic coating and associated solvent cleaning operation, identified as ECB-1, including one (1) electrostatic air atomized coating application booth and gun, and one (1) electric bake oven, with a maximum capacity to coat 3.23 plates per hour, controlled by dry filters.
- (m) One (1) photographic studio, identified as PS-1, with a maximum capacity to coat 3.23 plates per hour.
- (n) Handheld or hand activated grinders for deburring plate edges, identified as ED-1, with a maximum capacity of 3.23 plates per hour.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the electro static coating booth (ECB-1) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (3) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, including the stripping dip tanks (SDI-1), the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

- (4) Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operations) for conveyorized degreaser operations constructed after January 1, 1980, including the small format automated stripping machine (SDI-1) and the automated mechanical steel plate cleaning machine (PCR-1), the Permittee shall:

- (a) Minimize carryout emissions by:
 - (1) racking parts for best drainage; and
 - (2) maintaining the vertical conveyor speed at less than eleven (11) feet per minute;
- (b) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) Repair solvent leaks immediately, or shut down the degreaser;
- (d) Not use workplace fans near then degreaser opening;
- (e) Provide a permanent, conspicuous label summarizing the operating requirements.

- (5) Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreasing operations without remote solvent reservoirs existing as of July 1,

1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, including the steel plate cleaning dipping tanks (PCR-1), the Permittee shall ensure that the following requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (6) Pursuant to 326 IAC 8-2-9(d)(3) (Miscellaneous Metal Coating),

The volatile organic compound (VOC) content of the coating delivered to the applicator at the electrostatic spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance with the VOC content limit above shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits above, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

- (7) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the water heater shall not exceed 0.93 pound per million Btu heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where } Q = \text{total source capacity (MMBtu/hr)}$$

- For this unit, $Q = 1.83$ (MMBtu/hr), and $Pt = 0.93$ lb/MMBtu.

* This registration is the first registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Tracy DeHaven Parham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7901 to speak directly to Ms. Parham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,


Nysa James, Section Chief
Permits Branch
Office of Air Quality

ERG/TDP

cc: File – Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance – Paul Karkiewicz
Permit Tracking
Compliance Data Section
Air Toxics Program Development Section – Mike Brooks

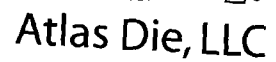
Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Atlas Chem-Milling
Address:	1627 West Lusher Avenue
City:	Elkhart, Indiana 46517
Authorized individual:	Kreig Lee
Phone #:	(800) 943-7291
Registration #:	039-22364-00502

I hereby certify that Atlas Chem-Milling is still in operation and is in compliance with the requirements of Registration 039-22364-00502.

Name (typed):
Title:
Signature:
Date:



2000 Middlebury St. - Elkhart, IN USA 46516

ORIGIN ID SBNA (574) 294-5507
TIM WAGGONER
ATLAS DIE LLC
2000 MIDDLEBURY STREET

SHIP DATE 26MAY11
ACTWGT 1 0 LB MAN
CAD 189194/CAFE2472
DIMS 13x10x1 IN

ELKHART, IN 46516
UNITED STATES US

BILL SENDER

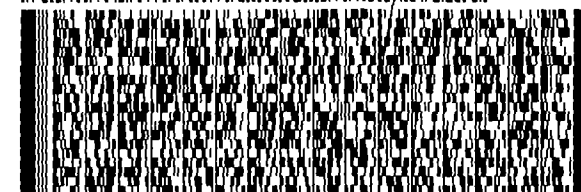
TO

US ENVIRONMENTAL PROTECTION AGENCY
%GRACE CO SE-5J
77 W. JACKSON BLVD.
CHICAGO IL 606043590

(312) 886-0562
PO: LETTER

REF: LETTER

DEPT: USENV.PRO.AGENCY



FedEx
Express



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U.S. Environmental
% Grace Co

77 West Jackson Blvd
Chi. Ill 60604-

448 6 0929 05.27

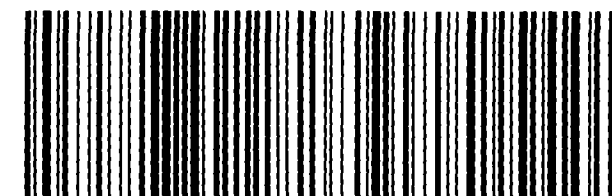
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